

RICE & BRONITSKY
Paul E. Rice (State Bar No. 062509)
350 Cambridge Avenue, Suite 225
Palo Alto, CA 94306
Telephone: 650-289-9088
Facsimile: 650-289-9093
price@civlit.com

Attorneys for Plaintiff
STEVEN NERAYOFF

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

STEVEN NERAYOFF,

Plaintiff,

v.

RAGER, BELL, DOSKOCIL and MEYER,
BRAD DOSKOCIL,

Defendants.

Case No.: C-07-03101 JW

STIPULATION AND [PROPOSED]
ORDER CONTINUING CASE
MANAGEMENT CONFERENCE

Date: January 28, 2008
Time: 10:00 a.m.
Ctrm.: 8, 4th Floor

COME NOW the parties, Plaintiff Steven Nerayoff ("Plaintiff") and Defendants Rager, Bell, Daskocil and Meyer ("RBDM"), Rossi, Daskocil & Finkelstein, LLP ("RDF") and Brad Daskocil ("Daskocil") (collectively the "Parties"), by and through their counsel of record and as a stipulation in the above-referenced matter, state as follows:

1. Defendants RBDM, RDF and Daskocil appear specially before the Court in this Stipulation for the sole purpose stated herein and do not waive any and/or all objections that may be asserted as to venue. Further, this Stipulation is entered into and this special appearance is made by RBDM, RDF, and/or Daskocil without any prejudice to RBDM, RDF, and/or Daskocil's ability to bring a motion for an order dismissing this action and/or transferring this action on the grounds that venue in the Northern District is improper.

2. The Parties previously entered a Stipulation seeking a continuance of the Case Management Conference and the deadline for Defendants to respond to the Complaint. The Stipulation was filed on December 13, 2007. The Order granting the continuance was filed on December 14, 2007.

3. The Parties enter this Stipulation and seek a continuance of the Case Management Conference, currently scheduled for January 28, 2008, at 10:00 a.m., as Plaintiff's counsel is not available to appear on January 28, 2008, due to other court appearances scheduled for that date.

4. The Parties request that the Case Management Conference be continued to February 25, 2008, and that the deadline for filing the Joint Case Management Statement be continued to February 15, 2008.

5. The Parties stipulate that they be allowed to reserve their right to seek further enlargement of time and propose a modified case management plan consistent with the Standing Order for All Judges of the Northern District of California, Contents of Joint Case Management Statement.

DATED: December 21, 2007 **RICE & BRONITSKY**

By: /s/ Paul E. Rice
Paul E. Rice
Attorney for Plaintiff Steven Nerayoff

DATED: December 21, 2007 **CHAPMAN, GLUCKSMAN & DEAN**
A Professional Corporation

By: /s/ Stephanie Sessions Perkins
Stephanie Sessions Perkins
Attorneys for Specially Appearing Rager, Bell, Doskocil and
Meyers and Specially and Jointly Appearing Brad Dosckocil,
CPA

1 DATED: December 21, 2007

FARBSTEIN & BLACKMAN
A Professional Corporation

2
3 By: /s/ John S. Blackman

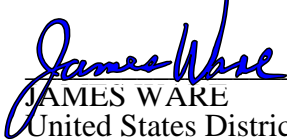
4 John S. Blackman

5 Attorneys for Specially Appearing Defendant Rossi,
6 Doskocil & Finkelstein and Specially and Jointly Appearing
7 Defendant Brad Dosckocil, CPA
8
9

10 Pursuant to Stipulation, **IT IS SO ORDERED.**

11 The Court notes that the matter has been continuously moved on the Court's calendar. This is
12 parties' last request for continuance.

Dated: January 2, 2008


JAMES WARE
United States District Judge

RICE & BRONITSKY
350 Cambridge Ave., Suite 225
Palo Alto, CA 94306
(650) 289-9088